

EXHIBIT B

DEFENDANT'S BOL CALCULATIONS

Offenses After November 1, 2003

502 pills X 80 mg = 40,160 mg
40,160 mg divided by 1,000 = 40.16 grams
40.16 grams X 6,700 = 269,072 grams of marijuana equivalent
269,072 grams divided by 1,000 = 269 kilograms (marijuana equivalent)

BOL: 26 (63-78)

Comparison to Offenses Prior to November 1, 2003

136.4 grams (weight of 502 pills) X 500 = 68,200 grams of marijuana equivalent
68,200 grams divided by 1,000 = 68.2 kilograms

BOL: 22 (41-51)

Offenses After November 1, 2003

1351 pills X 80 mg = 108,080 mg
108,080 mg divided by 1,000 = 108.08 grams
108.08 grams X 6,700 = 724,136 grams of marijuana equivalent
724,136 grams divided by 1,000 = 724 kilograms (marijuana equivalent)

BOL: 30 (97-121)

Comparison to Offenses Prior to November 1, 2003

1351** pills X .27 grams (weight of pills) = 364.77 grams
364.77 grams X 500 = 182,385 grams
182,385 grams divided by 1,000 = 182 kilograms (marijuana equivalent)

** Average weight of each 80 mg tablet is approximately .27 grams

BOL: 26 (63-78)

Offenses After November 1, 2003

500 pills "every few weeks" inclusive of the 502 pills seized on June 30, 2004

8 deliveries with total of 500 pills = 4,000 pills
4,000 pills X 80 mg = 320,000 mg
320,000 mg divided by 1,000 = 320 grams
320 grams X 6700 = 2,144,000 grams of marijuana equivalent
2,144,000 divided by 1,000 = 2,144 kilograms (marijuana equivalent)

BOL: 32 (121-151)

Comparison to Offenses Prior to November 1, 2003

4000** pills X .27 grams (weight of pills) = 1080 grams
1080 grams X 500 = 540,000 grams
540,000 grams divided by 1,000 = 540 kilograms (marijuana equivalent)

** Average weight of each 80 mg tablet is approximately .27 grams

BOL: 28 (78-97)

PROBATION'S CALCULATIONS

Offenses After November 1, 2003

500 pills twice monthly = 1,000 pills per month
1,000 pills per month X 6 months = 6,000 pills
6,000 pills X 80 mg = 480,000 mg
480,000 mg divided by 1,000 = 480 grams
480 grams X 6,700 = 3,216,000 grams of marijuana equivalent
3,216,000 grams divided by 1,000 = 3,216 kilograms (marijuana equivalent)

Plus:

502 pills X 80 mg (weight of each pill) = 40,160 mg
40,160 mg divided by 1,000 = 40.16 grams
40.16 grams X 6,700 = 269,072 grams of marijuana equivalent
269,072 grams divided by 1,000 = 269 kilograms (marijuana equivalent)

Total Marijuana Equivalent: 3,216 + 269 = 3485 kilograms (marijuana equivalent)

BOL: 34 (151-188)

Comparison to Offenses Prior to November 1, 2003

6000** pills X .27 grams (weight of pills) = 1620 grams
1080 grams X 500 = 810,000 grams
810,000 grams divided by 1,000 = 810 kilograms (marijuana equivalent)

Plus:

136.4 grams (weight of 502 pills) X 500 = 68,200 grams of marijuana equivalent
68,200 grams divided by 1,000 = 68.2 kilograms

Total Marijuana Equivalent: 810 + 68.2 = 878.2 kilograms (marijuana equivalent)

** Average weight of each 80 mg tablet is approximately .27 grams

BOL: 30 (97-121)

GOVERNMENT'S CALCULATIONS

Current law – After November 1, 2003

20,000 pills X 80 mg = 1,600,000 mg
1,600,000 mg divided by 1000 = 1,600 grams
1,600 grams X 6,700 = 10,720,000 grams of marijuana equivalent
10,720,000 divided by 1,000 = 10,720 kilograms (marijuana equivalent)

BOL: 36 (188-235)

Comparison to Offenses Prior to November 1, 2003

20,000** pills X .27 grams (weight of pills) = 5400 grams
5400 grams X 500 = 2,700,000 grams
2,700,000 grams divided by 1,000 = 2700 kilograms (marijuana equivalent)

** Average weight of each 80 mg tablet is approximately .27 grams

BOL: 32 (121-151)